

DEFENDANT McCALIN'S MOTION FOR LEAVE TO FILE ADDITIONAL MOTIONS

TIMOTHY R. McCLAIN, by and through counsel, requests that the court allow counsel additional time to file motions, if necessary, and would offer the court the following:

The discovery process is ongoing. As counsel investigates Mr. McClain's defense and as discovery continues, further motions may be required. Should additional facts or legal issues arise, counsel requests leave of court to address those matters in future motions.

Respectfully submitted,

TIMOTHY McCLAIN

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2014, I will electronically file the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to:

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and all counsel of record.

/s/

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